

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MARK M. THORNTON,
Plaintiff

V.

NORTHEAST BUILDERS TRANSPORT, INC.
And BARRY N. EHRSTEIN,
Defendants

CIVIL ACTION No. 03-12521-RGS

JOINT STATEMENT UNDER L.R. 16.1

Plaintiff, Mark M. Thornton, and Defendants, Northeast Builders Transport, Inc. and Barry N. Ehrstein, have conferred pursuant to Local Rule 16.1 and proposed the following pretrial schedule for the Court's consideration at the initial scheduling conference set for March 8, 2004 at 3:45 p.m.

1. Proposed Discovery Schedule

- | | | |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| a. | Automatic disclosure to be served by | March 22, 2004 |
| | There are a number of documents believed to be in all parties' possession already, and for these the parties shall arrange for review and copying at a mutually convenient time. | |
| b. | All facts discovery requests to be served by | April 21, 2004 |
| | All fact depositions to be noticed by | September 30, 2004 |
| | Fact depositions to be completed by | December 30, 2004 |
| | Rule 26(A)(2)(B) disclosure of trial experts by plaintiff served by | January 31, 2005 |
| | Rule 26(A)(2)(b) disclosure of trial experts by defendant served by | March 31, 2005 |

Expert Depositions concluded by

June 30, 2005

Rule 56 Motions to be filed by

July 30, 2005

2. **Certification**

The parties will file the certifications required by Local Rule 16.1 at or before the conference.

3. **Magistrate Judge**

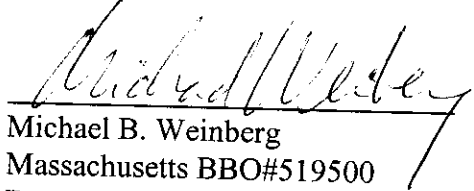
Defendants' counsel does not consent to trial before a Magistrate Judge.

Respectfully submitted,

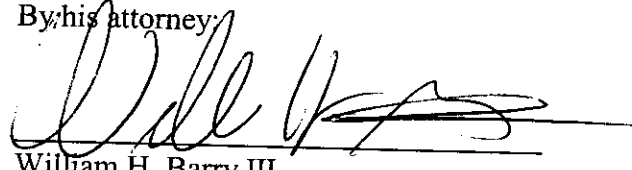
NORTHEAST BUILDERS TRANSPORT, INC.
BARRY N. EHRSTEIN

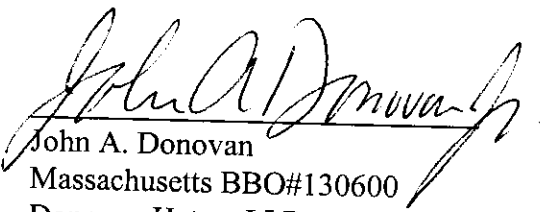
MARK M. THORNTON

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